

ROCKWELL LIME COMPANY

4110 Rockwood Rd., Manitowoc, WI 54220-9619 • 920-682-7771 • 1-800-558-7711 • Fax: 920-682-7972

April 27, 2004

U.S. Environmental Protection Agency
Region 5
Air & Radiation Division
77 West Jackson Blvd.
Chicago, IL 60604-3507

RECEIVED

MAY 04 2004

AIR ENFORCEMENT BRANCH,
U.S. EPA REGION 5

SUBJECT: LIME MACT NOTIFICATION

Dear Sir or Madam:

This letter concerns the requirement for plants that manufacture quicklime to submit an initial notification by May 3, 2004 regarding the applicability of the NESHAP for Lime Manufacturing at 40 CFR Part 63, Subpart AAAAAA, as required under 40 CFR §63.7130(a) and §63.9(b). Rockwell Lime Company has not conducted testing of hazardous air pollutants (HAPs) at the Manitowoc plant, and thus has no definitive basis for determining whether the plant is subject to the above-referenced regulation. Accordingly, this notification is being submitted as a "protective filing" in the event that future testing indicates that the plant is a major source of HAPs. However, if the company subsequently determines that the plant is not a major source of HAPs, we reserve the right to withdraw this notification.

1. The name and address of the owner or operator:

Rockwell Lime Company
4110 Rockwood Road
Manitowoc, WI 54220

2. The name and address (physical location) of the source (lime plant):

Rockwell Lime Company
4110 Rockwood Road
Manitowoc, WI 54220

3. An identification of the relevant source category and the source's compliance date:

Source Category: "Lime Manufacturing"

Compliance date: January 5, 2007

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4. A brief description of the nature, size, design and method of operation of the source, and an identification of the types of emission points within the source category subject to the lime MACT and the types of HAPs emitted.

Source description

Quicklime manufacturing, using rotary kilns

Kiln design capacity: 164,250 tpy lime

Limestone processed through the kilns: 328,500 tpy

Emission points for PM (surrogate for metal HAPs)

Lime Kiln Stack S11*

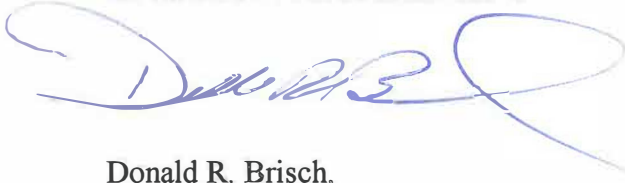
Stone Processing Operations, starting with the processed stone storage bin

Emission points for HCl

Designated with an asterisk above. However, HCl emissions are not subject to regulation under the lime NESHAP because EPA determined that it does not warrant regulation pursuant to Section 112(d)(4) of the Clean Air Act.

Sincerely,

ROCKWELL LIME COMPANY



Donald R. Brisch,
President

Cc: James G. Crawford, P.E. - WDNR

